

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
Atlanta Division**

EMMA KOE et al.,

Plaintiffs,

v.

CAYLEE NOGGLE et al.,

Defendants.

Case No. _____

DECLARATION OF SUSAN ELISSA HALLA

I, Susan Elissa Halla, hereby declare and state as follows:

1. I am over the age of eighteen, of sound mind, and in all respects competent to testify. I have personal knowledge of the information contained in this Declaration and would testify completely to those facts if called to do so.
2. I am the Board President of TransParent and a mother of a transgender child who is now an adult. TransParent is a 501(c)(3) not-for-profit organization with a mission to bring compassionate support to parents navigating complex issues that arise in raising their transgender children.
3. TransParent was founded in 2011, when a group of parents based in St. Louis, Missouri started having monthly meetings to discuss their

experiences raising transgender children. These parents met in hopes of finding connection, support, and resources. In 2013, TransParent invested in a website that allowed TransParent to organize and share local professional resources in transgender care, including pediatricians, endocrinologists, therapists, surgeons, and transgender-friendly schools. Today, TransParent is comprised of nineteen chapters in eleven states across the country—all of whom continue to gather in monthly meetings to share resources and support one another's families.

4. TransParent serves three primary purposes for its members: connection, resources, and visibility.
 - a. Parents of transgender children can often feel isolation and loneliness while navigating the unique experiences of raising their children. TransParent chapters offer safe spaces for parents to be open about their feelings, giving them strength and confidence to support and to become advocates for their children.
 - b. TransParent also provides its members with expert resources to assist families with their children's gender journey. These resources include news articles, blogs, videos and podcasts with information specific to raising transgender children, books with information for families,

educational materials like fact sheets, and ways to connect with local medical, legal, and other support professionals.

c. Finally, TransParent creates a welcoming network for its members' families so that they feel seen, heard, and supported by their communities at large.

5. TransParent consists of two interrelated parts: a national organization and its individual local chapters. The national organization hosts monthly virtual chapter meetings, while the local chapters typically host monthly in-person meetings.
6. TransParent's national organization is led by a Board of Directors. I serve as the President of the Board. I was elected to the position starting January 1st, 2022. The Board is also comprised of a Vice President, Secretary, Treasurer, At-Large Chapter Chair, Committee Members, and Advisors. Board members are selected by members of the existing Board, who conduct interviews of candidates and then vote on those candidates. Board members serve two consecutive three-year terms.
7. Local chapters are led by individual chapter leaders, who must be the parent or guardian of a gender-expansive child. Chapter leaders organize and oversee monthly support meetings and provide organized resources to member families.

8. In order for individuals to join local TransParent chapters, they must also be the parents or guardians of a gender-expansive child. Typically, chapter leaders require those individuals to submit an application confirming as much before they are admitted as members and allowed to attend the monthly support meetings.
9. Local chapter leaders take attendance at each monthly support meeting. They send that attendance information to TransParent's national organization to keep track of membership. Accordingly, members of local TransParent chapters are also members of the national organization.
10. Individual chapters are formed by an application process. Individuals must fill out an application explaining why they want to start a TransParent Chapter in their community, detail the level of commitment they have to starting and growing a local chapter, and identify the geographical areas they expect to support. Applicants must also state how many parents and families they expect to attend their local chapter group meetings, and whether they have an assigned meeting location that is confirmed by an agreement with the facility. Additionally, applicants must adhere to TransParent's privacy policy and confidentiality agreement and agree to a criminal background check.

11. As of today, TransParent has local chapters in Oregon, Arizona, Texas, Missouri, Illinois, Indiana, Tennessee, Mississippi, Florida, Virginia, and Georgia.
12. S.B. 140's ban on gender-affirming medical care for minors directly implicates each prong of TransParent's mission.
 - a. TransParent has worked tirelessly through its community-building and advocacy efforts to help transgender children and their families feel connected to one another, and to feel visible and valued in their communities. S.B. 140 specifically targets transgender children and eliminates their access to safe, effective, and affirming medical care. This further stigmatizes transgender children—deepening the social isolation and ostracization experienced by those children and their families that TransParent is actively fighting to eliminate.
 - b. Moreover, TransParent has spent over a decade compiling and organizing resources for its members about how to access gender-affirming medical care. S.B. 140 eliminates key forms of gender-affirming medical care, including access to hormone therapy. The ban therefore prevents TransParent from providing its members with resources to connect them to experts and providers to render that care—a key function of the organization.

13. When the Georgia legislature passed S.B. 140, banning essential gender-affirming medical care for transgender minors, both our Georgia chapter and national organization heard an immediate outcry from TransParent members. Parents were scared that they would no longer be able to access hormone therapy for their children—a critical component of the standard of care for treating gender dysphoria. They feared that S.B. 140 would further isolate and ostracize their children, and increase the risk they succumb to anxiety, depression, and suicidal ideations.
14. TransParent exists to prevent these outcomes. Our organization seeks to foster a world where transgender children can become thriving, healthy, and happy adults—and their parents feel supported and empowered in facilitating that process.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of June, 2023.

Respectfully Submitted,

A handwritten signature in blue ink, reading "Susan Halla", is written over a horizontal line.

Susan Halla